

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ DELTA, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY,  
INC., COMMSCOPE, INC., ARRIS US  
HOLDINGS, INC., ARRIS SOLUTIONS,  
INC., ARRIS TECHNOLOGY, INC., and  
ARRIS ENTERPRISES, LLC,

*Defendants.*

Civil Action No.: 2:21-cv-310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF DEFENDANTS' OPPOSED  
MOTION FOR A PARTIAL STAY PENDING  
INTER PARTES REVIEW OF THE '835 PATENT**

I, Andrew S. Ong, declare and state as follows:

1. I am an attorney at Goodwin Procter LLP, and counsel of record for Defendants in the above-entitled case. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify as to the following.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Decision Granting Institution of *Inter Partes* Review, dated August 18, 2022, issued by the Patent Trial and Appeal Board in *Nokia of America Corp. v. TQ Delta, LLC*, Case No. IPR2022-00471.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: August 22, 2022

By: /s/ Andrew S. Ong  
Andrew S. Ong